

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

IXIA MERCADO CONCEPCION,  
  
Debtor.

Case No. 13-09126-BKT

Chapter 7

NILSA LYON RIOS, LEON LYON, JR.,  
  
Plaintiffs,  
  
v.

Adversary No. 14-00002 (BKT)

IXIA MERCADO CONCEPCION,  
  
Defendant.

**INFORMATIVE MOTION JOINING CO-DEFENDANT TRUST'S *SUR-REPLY TO PLAINTIFFS' REPLY TO OPPOSITION TO MOTION REQUESTING ENTRY OF DEFAULT, AND REPLY TO OPPOSITION TO REQUEST FOR RELIEF* (Dkt. 50)**

TO THE HONORABLE COURT:

COME NOW Marcel Blay-Mercado and Bianca Blay-Mercado, through their undersigned attorneys, and respectfully allege, state and pray:

1. On this same date, the Blay-Mercado Siblings Trust ("Trust") filed a Su-reply to Plaintiffs' Reply to Opposition to Motion Requesting Entry of Default, and Reply to Opposition to Request for Relief. (Dkt. 50).

2. Co-defendants Marcel Blay-Mercado and Bianca Blay-Mercado hereby join the arguments presented by the Trust and incorporate herein the arguments in opposition to the entry of Default.

7. Co-defendants also request that this Court order plaintiffs to properly serve them,

and that it order the plaintiffs to cease discovery until they have been properly served and have had an opportunity to respond to the amended complaint.

WHEREFORE, the Blay-Mercado siblings respectfully request from this Honorable Court that it denies plaintiffs' Motion Requesting Entry of Default, that it quashes plaintiffs' service on Marcel Blay-Mercado and Bianca Blay-Mercado, and that it orders the plaintiffs to cease discovery until they have been properly served and have had an opportunity to respond to the Amended Complaint.

Respectfully submitted.

In San Juan, Puerto Rico, this 30<sup>th</sup> day of July, 2014.

I HEREBY CERTIFY: That on this same date I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record.

s/ Monique Guillemard-Noble  
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#### **NOTICE**

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this

paper with the clerk's office of the United States Bankruptcy Court of the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the court, the interest of justice requires otherwise.